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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	X	
In re:	:	Chapter 11
	:	
SEARS HOLDING CORPORATION, et al.,	:	Case No.: 18-23538 (RDD)
	:	
Debtors.1	:	(Jointly Administered)
	:	

NOTICE OF ENTRY OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned attorney hereby appears as counsel to San Patricio Plaza ("SPP") landlord and creditor in the chapter 11 cases of the above-captioned debtors and debtors-in-possession. Under sections 342 and 1109(b) of title 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 et seq., and pursuant to Rules 2002, 3017(a), 9007,

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SRC Sparrow 1 LLC (None); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); SRC Sparrow 2 LLC (None); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); SRC O.P. LLC (None); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); SRC Facilities LLC (None); and SRC Real Estate (TX), LLC (None). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

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and 9010(b) of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules"), SPP requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statement(s) and plan(s) of reorganization, or other documents, filed or entered in these chapter 11 cases, be served on:

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PLEASE TAKE FURTHER NOTICE THAT this request for notice includes, without limitation, not only the notices and papers filed in the chapter 11 cases and referred to in the paragraph above, but also includes orders and notices of any application, motion, petition, pleading, request, complaint, or demand filed or submitted in related proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise, that affects or seeks to affect in any way (1) the rights or interests of SPP in these cases, (2) property or proceeds thereof in the possession, custody, or control of SPP, or (3) requires or prohibits, or seeks to require or prohibit, any act, delivery of any property, payment or other conduct by SPP.

PLEASE TAKE FURTHER NOTICE THAT, in accordance with Bankruptcy Rule 3017(a), this request also constitutes a request in writing for copies of any disclosure statement or plan filed in this case.

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PLEASE TAKE FURTHER NOTICE THAT neither this notice of appearance nor any prior or later appearance, pleading, claim, or suit shall waive any right of SPP (1) to have final orders in non-core or private right of action matters entered only after de novo review by a higher court, (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, or (4) to any other rights, claims, actions, defenses, setoffs or recoupments, under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: November 26, 2018 Fort Lauderdale, Florida

Respectfully submitted,

Law Offices of Penny R. Stark

By: <u>s/s Penny R. Stark</u>

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